

December 6, 2012

Chairman Julius Genachowski
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20054

Re. MB Docket No. 09-182, 2010 Quadrennial Review

Dear Chairman Genachowski and Commissioners:

In our capacities as the leaders of the nation's largest civil rights organizations, the National Urban League (NUL), National Council of La Raza (NCLR), Asian American Justice Center (AAJC) and the National Association for the Advancement of Colored People (NAACP), we write to clarify our positions relating to the Commission's current deliberations regarding changes to media ownership rules.

We felt it was necessary to clarify our positions because recent media reports may have misconstrued them. What we clarify here are the positions noted in our filings of March 5, 2012 in partnership with the Diversity and Competition Supporters (First FCC Filings) and of November 20, 2012 in partnership with the Leadership Conference on Civil and Human Rights (Second FCC Filing).

Contrary to what has been stated in the media including an article in Communications Daily on 12.4.2012, we do not support the relaxation of the newspaper/broadcast cross-media ownership rule (NBCO). In our First FCC Filings, we stated that we do not object to a relaxation of the NBCO if such a relaxation would not diminish minority ownership.

This means, any implication that we support the relaxation of the NBCO without referring to this caveat of its impact on minority ownership is incorrect. The Commission should not move ahead with any changes to the NBCO until a credible, objective and data-based analysis of the impact of such changes is completed. We do not believe that that analysis has been completed.

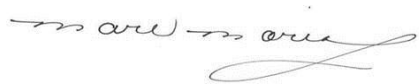
To further clarify our position, we do not believe that the 30 days time period that the Commission has provided to interested parties to comment on the ownership data released by the Commission on November 14, 2012 is sufficient to analyze whether any relaxation of the NBCO will diminish minority ownership. We also believe that the burden of proof is on the

Commission to produce analysis for further public comment that any proposed changes to the NBCO or anything else in the 2010 Quadrennial Review will not diminish minority ownership.

Finally we are extremely disappointed by the Commission's failure to undertake the required analysis to create a set of rules that advance minority ownership and comply with the rules set out by the Supreme Court. The answer is not to state that the Supreme Court has tied the Commission's hands and therefore, the Commission is unable to act on minority ownership, but rather, to design solutions that comply with the Supreme Court's strict rules.¹ At a minimum, this requires the Commission setting aside necessary funding to undertake the analysis needed to create these solutions.

Please contact Madura Wijewardena (NUL) at 202-629-5753, Lisa Navarrete (NCLR) at 202-785-1670, Jason Lagria (AAJC) at 202-296-2300 or Hilary Shelton (NAACP) at 202-463-2940 if you would like to discuss the above issues.

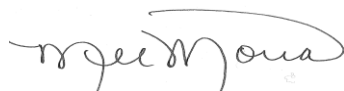
Sincerely,



Marc H. Morial
President and CEO
National Urban League



Janet Murguía
President and CEO
National Council of La Raza



Mee Moua
President and Executive Director
Asian American Justice Center



Hilary O. Shelton
Director, NAACP Washington Bureau & Senior Vice
President for Advocacy and Policy
NAACP

cc: U.S. Senator John D. Rockefeller IV
Chairman, U.S. Senate Committee on Commerce, Science and Transportation
U.S. Senator Kay Bailey Hutchison
Ranking Member, U.S. Senate Committee on Commerce, Science and Transportation
U.S. Representative Fred Upton
Chairman, U.S. House of Representatives Committee on Energy and Commerce
U.S. Representative Henry A. Waxman
Ranking Member, U.S. House of Representatives Committee on Energy and Commerce

¹ We note that the FCC's own Diversity Committee and our First FCC Filings have recommended a range of race neutral solutions to advance minority ownership that we believe meet the Supreme Court strict standards. At a minimum the Commission should analyze these proposals and provide its analysis for public comment.